



**National Park Service
U.S. Department of the Interior**

**Jefferson National Expansion Memorial
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Closed Circuit Television Policy

Foreword

Purpose

This Guideline Manual establishes policy for the use of closed circuit television cameras and provides procedures for their use.

Policy

It shall be the policy of the Jefferson NEM to use closed circuit television cameras (CCTV) in a professional manner and only to further legitimate law enforcement and public safety objectives.

Scope

The provisions of this Guideline Manual apply to personnel located in areas where closed circuit television cameras exist.

Amendments

All proposed changes to this Guideline Manual shall be submitted through the appropriate chain of command to the Chief Ranger.

Effective Date

This Guideline Manual becomes effective upon signature of the park Superintendent.

I. Background

In order to help ensure public safety and security, the National Park Service has installed closed circuit television cameras (CCTV) on the Arch Grounds, inside the Arch Complex, the exterior of the Dispatch office, and inside the Ranger Station holding cells/booking area. The installation of the cameras are part of the National Park Service's integrated approach to provide enhanced protection for employee and visitor safety and will provide critical supplemental assistance to officers' and rangers' ongoing security and public safety efforts.

The installation of CCTV is consistent with the 1999 Booz, Allen and Hamilton Strategic Counter-Terrorism Plan for the National Park Service, which recommended such cameras as part of an integrated approach for enhanced protection from terrorist activity against our National Parks and memorials, which are well recognized symbols of America's heritage.

CCTV's importance has become even more pressing following the terrorist attacks of September 11, 2001. As detailed in The National Strategy for the Physical Protection of Critical Infrastructures and Key Assets (February 2003), "[t]he need to protect our national icons and monuments from terrorist attack requires the development and coordination of comprehensive policies, practices, and protective measures" and involves "the task of balancing open visitor access to these structures with the protection of visitors and the structures themselves."

While enhanced protections have been implemented, the CCTV system is a critical component in the National Park Service's efforts to protect these monuments, memorials, facilities and our park visitors. CCTV is an effective law enforcement and security tool, but it is not intended to replace law enforcement officers who, if

available and on site, remain “the most effective countermeasure available.” CCTV does, however, “extend the coverage of the individual officer” and allows “surveillance of multiple locations simultaneously and cover greater area than can be covered by on site NPS personnel.”

The American Bar Association’s “Standards for Criminal Justice Electronic Surveillance” (3rd ed. 1998) recognizes that CCTV “can be an important law enforcement tool” that “can facilitate the detection, investigation, prevention, and deterrence of crime, the safety of citizens and officers, the apprehension and prosecution of criminals, and the protection of the innocent.” To ensure that adequate privacy and First Amendment safeguards exist, this Guideline Manual establishes policy and procedures authorizing the limited use of CCTV and the proper disposition of stored images. This Guideline Manual does not apply to the monitoring or recording of oral communications that is generally governed by Title III of the Crime Control Act of 1968.

II. CCTV Policy and Procedures

A. Objectives.

1. CCTV will be used to help ensure public safety and security; facilitate the detection, investigation, prevention and deterrence of terrorist attack and crime; help ensure the safety of citizens and officers; help assist in the proper allocation and deployment of law enforcement and public safety resources; and help facilitate the protection of the innocent and the apprehension and prosecution of criminals.
2. CCTV will be used only to visually monitor public park areas and public activities where no constitutionally protected reasonable expectation of privacy exists.

B. Operation and Use

1. CCTV cameras, which will also record its images, will be operated by the National Park Service twenty-four hours a day, seven days a week, in a professional manner and only to further legitimate law enforcement and public safety objectives.
2. No person will be targeted or monitored merely because of race, religion, gender, sex, disability, national origin and political affiliation or views.
3. CCTV will not target or focus on the faces of persons engaging in First Amendment demonstration activity unless there is a reasonable indication of a threat to public safety or that they are engaging in criminal activity.
4. Disclosure and use of any information obtained will be limited to appropriate law enforcement and public safety purposes.

C. The CCTV Controlled Facility

1. CCTV images will be transmitted through secured hardwire tamper-alert feeds.
2. CCTV images will be gathered by unattended recording devices that are accessible only by authorized personnel.
3. Access to the CCTV system will be limited to authorized law enforcement, security, maintenance, and repair personnel, whose access, with date and time information, will be documented in writing.
4. The supervisory official assigned to, or responsible for, the controlled facility shall monitor the activities of assigned personnel to ensure full compliance with this Guideline Manual.

D. Live and Recorded CCTV Images

1. Access to recorded images will be limited to authorized law enforcement and security personnel and park managers for public safety purposes and to government attorneys and police managers for civil litigation and disciplinary purposes.
2. Any recorded video images shall be documented and stored in a secure location with controlled access that is limited to authorized personnel.


3. Any recorded video images shall be retained for no more than 6 months and then destroyed unless needed as evidence for a documented criminal incident. In the event a video recording needs to be retained more than 6 months, the reason(s) for the recording's retention, length of time, and its chain-of-custody shall be documented. Once the recording is no longer needed, it shall be destroyed.
4. Upon the written consent of the Regional Chief Ranger, selected photographic stills or portions of the video recording may be reproduced and retained for historical or training purposes, except that no such photograph/video still shall reveal any civilian's identity.

E. Accountability

1. Any violation of this Guideline Manual may result in appropriate disciplinary action.
2. The Office of Professional Responsibility may conduct periodic audits to ensure full compliance with this Guideline Manual.
3. Nothing in this Guideline Manual is intended to create any rights, privileges, or benefits not otherwise recognized by law. Rather, it is meant to ensure that CCTV is properly used based on legally appropriate and relevant law enforcement and public safety considerations and information.

F. Public Notice and Comments

The National Park Service encourages public comments regarding its CCTV policy and procedures contained in this Guideline Manual, which we will periodically reexamine and which is a matter of public record. Any suggested substantive revisions by the National Park Service must first be reviewed by the Solicitor's Office and appropriate government officials. Any public comments, complaints, or suggested changes should be directed to the Jefferson NEM, 11 N. 4th St, St Louis, MO 63102 Attn: Chief Ranger.

Approved: 
Michael M. Ward
Superintendent
Jefferson NEM

Date: 1/16/18